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April 19, 2017

BY ECF

The Honorable Sandra L. Townes
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Liga Restrepo Ramos*, Case No. 12-cr-672

Dear Judge Townes:

This firm represents Liga Restrepo Ramos ("Ramos") in connection with the above-referenced matter. We are writing to request an order permitting Ms. Ramos to travel to Colombia for ninety (90) days for the purpose of selling certain real estate in order to satisfy her forfeiture obligations. In or about May 2016, Your Honor granted a similar request, but for the purpose of Ms. Ramos visiting her terminally ill mother.

Ms. Ramos entered a plea of guilty to one count of conspiracy to commit money laundering in violation of 18 U.S.C. §1956(h). Ms. Ramos subsequently cooperated with the government's investigation for years, and received an exemplary § 5K1.1 letter. On August 7, 2015, Your Honor sentenced Ms. Ramos to probation for four years. During the first six months of her sentence, Ms. Ramos was subject to a curfew via electronic monitoring. In addition, Ms. Ramos agreed to a forfeiture amount of \$300,000 ("Forfeiture Order"). Ms. Ramos paid \$100,000 toward the

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Forfeiture Order at sentencing. Notably, Ms. Ramos has satisfied the curfew period of her sentence, and thus is no longer subject to any specific travel restrictions.

During sentencing, defense counsel specifically noted that Ms. Ramos would seek to satisfy the remaining forfeiture amount by selling properties in Colombia:

The \$300,000 forfeiture is going to be paid as follows: Her son Carlos is going to loan her \$100,000 today, tomorrow; he will wire it to our trust account and we will forward it to the appropriate authorities. With respect to the 200,000 remaining, she has properties in Columbia [*sic*]. Her sister is down there. Her sister is a joint owner of a bank account. The property and the home totaling, if sold, is more than 200,000. They are up for sale. As soon as they are sold and the sister will have the information on that, the sister will then deposit the money into the bank accounts, the joint bank account, and then will wire the money to my firm's trust account, which we will then forward to the appropriate authorities.¹

Subsequent to her sentencing, Ms. Ramos sold one of her properties in Colombia and, in or about May 2016, paid an additional \$82,000 towards her Forfeiture Order. As such, Ms. Ramos owes an outstanding balance of \$118,000 towards the Forfeiture Order. Ms. Ramos wishes to travel to Colombia for the period of May 15, 2017 to on or about August 15, 2017 to sell her remaining properties and satisfy the balance of the Forfeiture Order. Ms. Ramos proposes to travel via Miami International Airport and will return from Palmira Valle airport in Colombia. Ms. Ramos intends to stay in her mother's home during her visit.

As Your Honor may recall, Ms. Ramos currently resides in Florida with her daughter, Michelle Hernandez, and near her son Carlos Hernandez. Ms. Ramos is under the supervision of Probation Officer Harold Iglesias in the Southern District of Florida. I am informed that, to date, Ms. Ramos has satisfied all the conditions of her sentence without incident. As such, we respectfully submit that there is little to no risk of Ms. Ramos not returning to the United States.

Courts have broad authority to impose conditions on, and modify the scope of, the term of probation. *See e.g.* 18 U.S.C. § 3563(c) ("The court may modify, reduce, or enlarge the conditions of a sentence of probation at any time prior to the expiration or termination of the term of probation[.]") With respect to travel restrictions, however, such conditions on probation must be reasonably related to the defendant's rehabilitation and to the protection of the public. *See U.S. v. Porotsky*, 105 F.3d 69 (2nd Cir. 1997) (abuse of discretion to deny defendant's request to travel to Russia for business during his probation period where the government provided no legitimate

¹ *See* Transcript of Sentencing Hearing at 16:16 to 17:5 (August 7, 2015).

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reason for the denial). “[T]he relevant question is only whether both the defendant’s rehabilitation and the public interest would be served by preventing [the defendant] from travelling.” *Id.* at 72.

We respectfully submit that restricting Ms. Ramos from traveling to Colombia would not further her rehabilitation or protect the public. Ms. Ramos’s cooperation with the government’s investigation, exemplary post-conviction record, and dedication to her children underscores that she is committed to rehabilitation and does not present a danger to the public. Further, Ms. Ramos is not a flight risk. Ms. Ramos has established roots in Florida, where her daughter Michelle Hernandez and son Carlos Hernandez both reside. Stated simply, Ms. Ramos is a dedicated mother who will be traveling to Colombia to sell her remaining assets, and then return to Florida to be with her children.

Respectfully Submitted,

A handwritten signature in black ink that reads "Amit Sondhi /mex". The signature is written in a cursive, flowing style.

Amit Sondhi

cc: By Email

AUSA Brendan King, Esq.
Officer Harold Iglesias, Probation, Southern District of Florida
Denise Summers, Pre-Trial Services, Eastern District of New York